

United States District Court

EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

TYAS JOSEPH SHORT,

Defendant.

CRIMINAL COMPLAINT

Case No. 21-MJ-155-KEW

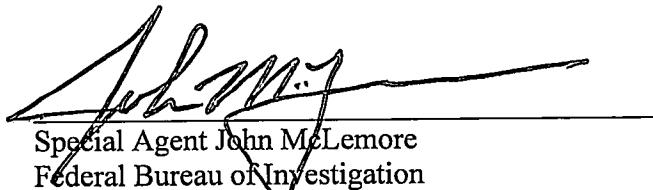
I, Special Agent John McLemore, the undersigned complainant, state that the following is true to the best of my knowledge and belief.

On or about April 7, 2019, in Indian Country and within the Eastern District of Oklahoma, defendant, TYAS JOSEPH SHORT committed the crime of Murder in Indian Country, in violation of Title 18, United States Code, Sections 1111(a), 1151, and 1153 and Use, Carry, Brandish, and Discharge of a Firearm During and in Relation to a Crime of Violence in violation of Title 18, United States Code, Section 924(c).

I further state that I am a Special Agent with Federal Bureau of Investigation, and that this complaint is based on the following facts:

(See attached Affidavit of Special Agent John McLemore, which is attached hereto and made a part hereof by reference.)

- Continued on the attached sheet.



Special Agent John McLemore
Federal Bureau of Investigation
Complainant

Sworn to and subscribed at:

MUSKOGEE, OKLAHOMA

Date: April 19, 2021



UNITED STATES MAGISTRATE JUDGE

Name and Title of Judicial Officer

Signature of Judicial Officer



**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF OKLAHOMA**

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Special Agent John McLemore, being duly sworn, depose and state that:

INTRODUCTION

1. Affiant is a Special Agent with the Federal Bureau of Investigation (FBI), and has been so employed for approximately 23 years. Affiant is currently assigned to the Oklahoma City Division and is authorized and responsible for conducting investigations of numerous criminal violations that fall within the FBI's jurisdiction.

2. The information in this affidavit was obtained by Affiant through the assistance of other law enforcement agents and agencies, including their reports, and through other sources specifically named in this affidavit.

3. Affiant is authorized to conduct, and has conducted, investigations of violent crimes in Indian Country.

4. This affidavit is intended to show that there is sufficient probable cause for a Complaint and does not set forth all my knowledge about this matter.

5. This affidavit is made in support of a Complaint and Arrest Warrant for the crime of Murder in Indian Country in violation of Title 18, United States Code, Sections 1111(a), 1151, and 1153 and Use, Carry, Brandish, and Discharge a Firearm During and in Relation to a Crime of Violence in violation of Title 18, United States Code, Section 924(c). In support of this request, I submit the following:

PROBABLE CAUSE

6. On April 7, 2019, at approximately 4:30 p.m., the Pittsburgh County Sheriff's Office (PCSO) responded to the vicinity of 1314 Krebs Lake Road, McAlester, Oklahoma, where a man had been reported shot in the roadway.

7. Upon arrival, deputies found a deceased person identified as Lane Garrett Crawley, 21 years of age, lying in the road partially covered with a blanket. Deputies found four shell casings in the road, as well as a fired slug near the deceased. Deputies interviewed A.H. who was a passenger in Crawley's Dodge truck. A.H. advised that she and Crawley were traveling on Krebs Lake Road when a male waved them over. A.H. said Crawley got out of the truck, exchanged a few words with the male, and then began fighting with the male. A.H. yelled at Crawley to get back in the truck. She then heard gunshots and noticed Crawley had been shot.

8. Another eyewitness, M.T. advised that Tyas Short, 18, and H.W., a minor, had stopped in the driveway located across the road from his residence on Krebs Lake Road. M.T. stated that Short was talking to him while H.W. remained across the road. M.T. said Crawley then stopped his pickup in the road near where he and Short were talking. Crawley exited his pickup truck, approached H.W., and began hitting him. When Crawley stopped hitting H.W., he began running back to his pickup. M.T. then saw Short shoot Crawley multiple times, killing Crawley.

9. Deputies then located and interviewed H.W., who corroborated much of M.T.'s statement. H.W. said Crawley stopped his truck suddenly on Krebbs Lake Road as H.W. began to cross the road. Crawley exited his truck, walked over to where H.W. was standing, and began talking to H.W. before Crawley started punching H.W. in the face. H.W. said as Crawley ran around and his truck, and began to enter said truck, H.W. heard gunshots. When he heard gunshots, H.W. ran with Short back to Short's father's truck, both entered the truck, and they departed the scene. Once in the truck, Short said to H.W.: "Bro, I think I killed him." Short then explained his

plans to exchange his father's truck for his car, and said he needed to "get rid of the gun." H.W. said the gun Short used to shoot Crawley was a Ruger 9mm, and was in Short's lap as they departed the scene.

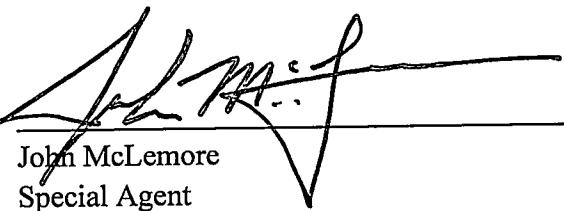
10. The Oklahoma State Bureau of Investigation (OSBI) was requested to process the crime scene. OSBI recovered five, 9mm shell casings, and one fired projectile from the scene.

11. The Oklahoma Office of the Chief Medical Examiner ruled Crawley's probable cause of death as multiple gunshot wounds. The manner of death was ruled homicide. In the Report of Autopsy, four gunshot wounds were noted, including two to the back of Crawley, one to the arm, and one to the head, all of which indicated a back to front trajectory.

12. The address located at 1314 Krebs Lake Road, McAlester, Oklahoma, is within the boundaries of the Choctaw Nation's Reservation and the Eastern District of Oklahoma.

13. According to Short's Tribal Citizenship Verification, "Short is recognized as a citizen of the Chickasaw Nation and possesses a Certificate Degree of Indian Blood (CDIB) with some degree of Chickasaw Indian blood."

14. To the best of my knowledge and belief, all statements made in this affidavit are true and correct. I believe probable cause exists for the issuance of an arrest warrant for Tyas Joseph Short, for the crime of Murder in Indian Country, a violation of Title 18, United States Code, Sections 1111(a), 2, 1151, and 1153 and Use, Carry, Brandish, and Discharge a Firearm During and in Relation to a Crime of Violence in violation of Title 18, United States Code, Section 924(c).



John McLemore
Special Agent
Federal Bureau of Investigation

Sworn to and subscribed before me this 19th th day of April, 2021.



UNITED STATES MAGISTRATE JUDGE